



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY  
ONE SOUTH STATION

MITT ROMNEY  
GOVERNOR

KERRY HEALEY  
LIEUTENANT GOVERNOR

BETH LINDSTROM  
DIRECTOR  
OFFICE OF CONSUMER AFFAIRS  
AND BUSINESS REGULATION

BOSTON, MA 02110  
(617) 305-3500

PAUL G. AFONSO  
CHAIRMAN

JAMES CONNELLY  
COMMISSIONER

W. ROBERT KEATING  
COMMISSIONER

JUDITH F. JUDSON  
COMMISSIONER

BRIAN PAUL GOLDEN  
COMMISSIONER

April 20, 2005

VIA EMAIL AND USPS

Christopher S. Aronson  
Counsel  
KeySpan Energy Delivery  
52 Second Avenue  
Waltham MA 02451

RE: Boston Gas Company v. 86 St. Stephen Condominium Association,  
D.T.E. 05-AD-2

Dear Attorney Aronson:

As we discussed, I have been assigned by the Commission of the Department of Telecommunications and Energy ("Department") as the Hearing Officer for the above-captioned proceeding. Please note that the docket number for this proceeding is D.T.E. 05-AD-2; any information you provide to the Department should reference this docket number.

Enclosed please find information requests. Responses are due no later than Friday, May 6, 2005. If the Company decides to settle this matter or to withdraw its request for a formal hearing for any reason, please submit a letter to that effect to the Department with a copy to the opposing party. If you have any questions, please feel free to contact me at 617-305-3561.

Sincerely,

Carol M. Pieper  
Hearing Officer

cc: Mr. Am Farhat  
Mary Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
TO BOSTON GAS COMPANY, D.T.E. 05-AD-2**

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to Boston Gas Company (“Boston Gas”) the following Information Requests.

**Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to Boston Gas in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case, and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Boston Gas or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. The term “Boston Gas” means Boston Gas, its agents, servants, or employees.
7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Serve a copy of the responses on each of the following: Mary Cottrell, Secretary, at the Department’s above address; and Mr. Am Farhat, Trustee & Manager, 86 St. Stephen Street Condominium Association, 86 St. Stephen Street, Boston, Massachusetts, 02115; also submit one copy of the responses to Carol Pieper, Hearing Officer.

### **Requests**

- DTE 1-1 State the account number and the current rate classification for the account at issue in this matter and located at 86 St. Stephen Street (“Property”).
- DTE 1-2 State the time period during which the rate classification was allegedly incorrect, including the start date and end date. If the rate classification changed during that time, include such change date.
- DTE 1-3 Provide copies of any and all documents pertaining to the rate classification of the Property during the time period stated in response to DTE 1-2 above, including, but not limited to, copies of any rate classification notices sent by the Company and invoices or bills.
- DTE 1-4 Provide a copy of the billing history for the property during the time period stated in response to DTE 1-2 above.
- DTE 1-5 State whether Boston Gas has calculated the amount of money in dispute, and if so, provide a detailed explanation of the method used for such calculation. If not, prepare a calculation and describe the method.
- DTE 1-6 Identify the legal theory that is the basis of your dispute. Provide any additional documentation you determine appropriate to support your claim.
- DTE 1-7 State any facts about this dispute on which you believe both parties would agree.



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COMMISSIONER

April 20, 2005

Mr. Am Farhat  
Trustee & Manager  
86 St. Stephen Street Condominium Association  
86 St. Stephen Street  
Boston MA 02115

RE: Boston Gas Company v. 86 St. Stephen Condominium Association,  
D.T.E. 05-AD-2

Dear Mr. Am Farhat:

As we discussed, I have been assigned by the Commission of the Department of Telecommunications and Energy ("Department") as the Hearing Officer for the above-captioned proceeding. Please note that the docket number for this proceeding is D.T.E. 05-AD-2; any information you provide to the Department should reference this docket number.

Enclosed please find information requests. Responses are due no later than Friday, May 6, 2005. If you decide to settle this matter, please submit a letter to that effect to the Department with a copy to the opposing party. If you have any questions, please feel free to contact me at 617-305-3561.

Sincerely,

Carol M. Pieper  
Hearing Officer

cc: Christopher S. Aronson  
Mary L. Cottrell, Secretary

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF THE  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY  
TO 86 ST. STEPHEN CONDOMINIUM ASSOCIATION, D.T.E. 05-AD-2**

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Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy (“Department”) submits to 86 St. Stephen Condominium Association (“86 St. Stephen”) the following Information Requests.

**Instructions**

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to 86 St. Stephen in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if 86 St. Stephen or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term “provide complete and detailed documentation” means:  
  
Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting workpapers.
5. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
6. The term “86 St. Stephen” means 86 St. Stephen Condominium Association, its agents, servants, or employees.
7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
8. Please serve a copy of the responses on each of the following: Mary Cottrell, Secretary, at the Department’s above address; and Christopher S. Aronson, KeySpan, 52 Second Avenue, Waltham, Massachusetts, 02451; also submit one copy of the responses to Carol Pieper, Hearing Officer.

### **Requests**

- DTE 1-1 State the account number and the current rate classification for the account at issue in this matter and located at 86 St. Stephen Street (“Property”).
- DTE 1-2 State the time period during which the rate classification was allegedly incorrect, including the start date and end date. If, to your knowledge, the rate classification changed during that time, include such change date.
- DTE 1-3 Provide copies of any and all documents you have retained pertaining to the rate classification of the Property during the time period stated in response to DTE 1-2 above, including, but not limited to, copies of any notices received from Boston Gas Company (“Boston Gas”) and invoices or bills received from Boston Gas. State whether these documents constitute all of the documents you have received from Boston Gas during the time period.
- DTE 1-4 State, to the best of your knowledge, the amount of money in dispute and how you determined the amount.
- DTE 1-5 To the extent you are able, identify the legal theory that is the basis of your dispute. Provide any additional documentation you determine appropriate to support your claim.
- DTE 1-6 State any facts about this dispute on which you believe both parties would agree.